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18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**

20 **CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION**

21
22 ALEX MORGAN, et al.,

23 Plaintiffs/Claimants,

24 v.

25 UNITED STATES SOCCER
26 FEDERATION, INC.,

27 Defendant/Respondent.
28

Case No. 2:19-cv-01717-RGK-AGR

Assigned to: Judge R. Gary Klausner

**DECLARATION OF CARLI LLOYD IN
SUPPORT OF PLAINTIFFS' REPLY IN
SUPPORT OF MOTION FOR CLASS
CERTIFICATION**

Date: October 21, 2019

Time: 9:00 A.M.

Place: Courtroom 850

1 I, Carli Lloyd, declare as follows:

2 1. I am over the age of 18. If called upon to testify, I could and would
3 competently testify to the matters set forth in this declaration.

4 2. I have been a member of the WNT continuously since 2005.

5 3. The WNT players have played more games on an inferior surface of play,
6 artificial turf, than the MNT players. For example, from January 1, 2014 through
7 December 31, 2017, the WNT players played 62 domestic games, including games for
8 the World Cup and Olympic qualifiers. 13 of the 62 games (about 21%) were played on
9 artificial turf. For only 1 game was natural grass temporarily installed over a venue
10 with artificial turf. Over the same time period, the MNT played 32 domestic matches,
11 with 0 on artificial turf and 7 where natural grass was installed over a venue with
12 artificial turf.

13 4. I currently play for the Sky Blue FC in the National Women's Soccer
14 League ("NWSL"). In 2017, I played for Manchester City in the FA Women's Super
15 League. My employment with any domestic or foreign professional team is a separate
16 job from my national team employment with the USSF. This is the same for any WNT
17 player.

18
19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed on this 5th day of October, 2019.

21
22 
23 
24 _____
25 Carli Lloyd
26
27
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